

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**SUSANNE H. LINN and  
MELISSA KNESZ,**

**Plaintiffs,**

**v.**

**NORTHAMPTON COUNTY,  
NORTHAMPTON COUNTY  
DEPARTMENT OF CORRECTIONS,  
TODD BUSKIRK, WARDEN,  
AFSCME LOCAL 2549,**

**Defendants.**

**Civil Action No. 02-4417**

**JURY TRIAL DEMANDED**

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2003, upon consideration of Defendants' Motion for Leave to File a Reply Brief to Plaintiffs' Response to the Joint Motion in Limine of All Defendants to Preclude the Admission of Evidence Regarding the Tredinnick Report and Documents Related Thereto, it is hereby ORDERED that said Motion is GRANTED.

BY THE COURT:

\_\_\_\_\_  
Anita B. Brody, J.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

SUSANNE H. LINN and  
MELISSA KNESZ,

Plaintiffs,

v.

NORTHAMPTON COUNTY,  
NORTHAMPTON COUNTY  
DEPARTMENT OF CORRECTIONS,  
TODD BUSKIRK, WARDEN,  
AFSCME LOCAL 2549,

Defendants.

Civil Action No. 02-4417

JURY TRIAL DEMANDED

DEFENDANTS' MOTION FOR LEAVE TO FILE  
A REPLY BRIEF TO PLAINTIFFS' RESPONSE TO THE JOINT MOTION  
IN LIMINE OF ALL DEFENDANTS TO PRECLUDE THE  
ADMISSION OF EVIDENCE REGARDING THE  
TREDINNICK REPORT AND DOCUMENTS  
RELATED THERETO

Defendants Northampton County, Northampton County Department of Corrections, Todd Buskirk and AFSCME Local 2549 (collectively, "Defendants"), by and through their undersigned counsel, respectfully request that they be permitted to file a Reply to Plaintiffs' response to the Joint Motion in Limine of all Defendants to Preclude the Admission of Evidence Regarding the Tredinnick Report and Documents Related Thereto. In support of this Motion, Defendants set forth the following:

1. On July 15, 2003, Defendants filed six Joint Motions in Limine to preclude certain evidence with accompanying Briefs and proposed Orders.
2. On August 8, 2003, Plaintiffs filed a Consolidated Response to All Defendants' Motions.

3. Under Local Rule 7.1 (c) of the Eastern District of Pennsylvania – “Motion Practice,” the Court may “permit further briefs if appropriate.”

4. Defendants request that they be permitted to reply to Plaintiffs’ response regarding the admissibility of the Tredinnick Report and related documents.

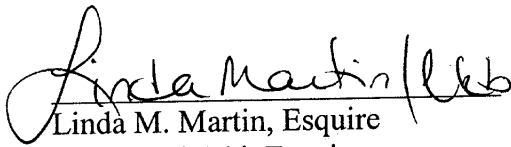
5. Defendants believe that the Court’s consideration of their Reply Brief specific to Defendants’ Joint Motion to Preclude the Admission of Evidence Regarding the Tredinnick Report and Documents Related Thereto would be helpful to the Court’s analysis of the legal arguments before it and would fully inform the Court of all applicable legal authority and pertinent facts developed in discovery necessary to render a fair, accurate and just decision.

6. Defendants, as the moving party bearing the burden of proof, respectfully request that they be permitted to briefly reply to Plaintiff’s arguments.

7. A copy of Defendants’ Reply Brief is attached hereto.

WHEREFORE, Defendants respectfully request that in the interest of justice and so that the Court is fully informed of all applicable law, this Court permit Defendants to file, and the Court will consider, Defendants' Joint Reply to Plaintiffs' Response To The Joint Motion In Limine Of All Defendants To Preclude The Admission of Evidence Regarding The Tredinnick Report And Documents Related Thereto.

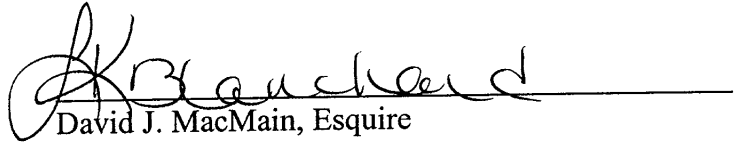
Respectfully submitted,



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24<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 656-3600

Attorneys for Defendant,  
AFSCME Local 2549

Dated: August 20, 2003



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123 South Broad Street  
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(215) 772-1500

Attorneys for Defendants,  
Northampton County, Northampton County,  
Department of Corrections, and Todd Buskirk

Dated: August 20, 2003

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

SUSANNE H. LINN and	:	Civil Action No. 02-4417
MELISSA KNESZ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
NORTHAMPTON COUNTY,	:	
NORTHAMPTON COUNTY	:	
DEPARTMENT OF CORRECTIONS,	:	
TODD BUSKIRK, WARDEN,	:	
AFSCME LOCAL 2549,	:	
	:	
Defendants.	:	

**BRIEF IN SUPPORT OF DEFENDANTS' MOTION  
FOR LEAVE TO FILE A REPLY BRIEF TO PLAINTIFFS'  
RESPONSE TO THE JOINT MOTION IN LIMINE OF  
ALL DEFENDANTS TO PRECLUDE THE ADMISSION  
OF EVIDENCE REGARDING THE TREDINNICK  
REPORT AND DOCUMENTS RELATED THERETO**

Defendants Northampton County, Northampton County Department of Corrections, Todd Buskirk and AFSCME Local 2549 (collectively, "Defendants"), by and through their undersigned counsel, respectfully request that they be permitted to file a Reply to Plaintiffs' response to the Joint Motion in Limine of all Defendants to Preclude the Admission of Evidence Regarding the Tredinnick Report and Documents Related Thereto.

**I. BASIS FOR MOTION**

On July 15, 2003, Defendants filed six Joint Motions in Limine to preclude certain evidence with accompanying Briefs and proposed Orders.

On August 8, 2003, Plaintiffs filed a Consolidated Response to All Defendants' Motions. Under Local Rule 7.1 (c) of the Eastern District of Pennsylvania, "Motion Practice," the Court may "permit further briefs if appropriate."

Defendants request that they be permitted to reply to Plaintiffs' response regarding the admissibility of the Tredinnick Report and related documents only. Defendants do not seek to reply to any other portion of Plaintiffs' Response.

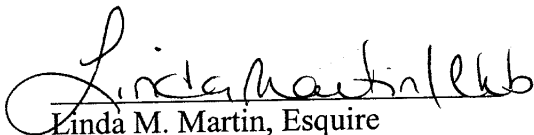
Defendants believe that the Court's consideration of their Reply Brief specific to Defendants' Joint Motion to Preclude the Admission of Evidence Regarding the Tredinnick Report and Documents Related Thereto would be helpful to the Court's analysis of the legal arguments before it and would fully inform the Court of all applicable legal authority and pertinent facts developed in discovery necessary to render a fair, accurate and just decision.

Thus, Defendants, as the moving party bearing the burden of proof, respectfully request that they be permitted to briefly reply to Plaintiff's arguments.

## II. CONCLUSION

Defendants respectfully request that in the interest of justice and so that the Court is fully informed of all applicable law, that this Court permit Defendants to file, and the Court will consider, Defendants' Joint Reply to Plaintiffs' Response To The Joint Motion In Limine Of All Defendants To Preclude The Admission of Evidence Regarding The Tredinnick Report And Documents Related Thereto.

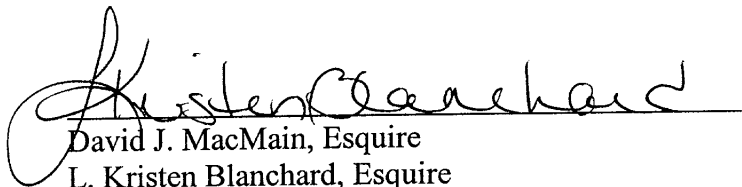
Respectfully submitted,



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Attorneys for Defendant,  
AFSCME Local 2549

Dated: August 20, 2003



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(215) 772-1500

Attorneys for Defendants,  
Northampton County, Northampton County,  
Department of Corrections, and Todd Buskirk

Dated: August 20, 2003

**CERTIFICATE OF SERVICE**

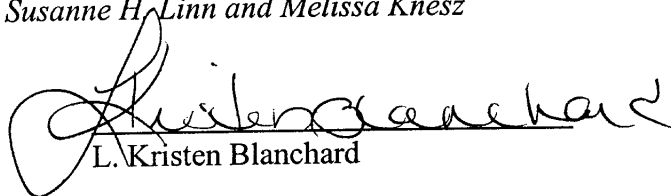
I hereby certify that on the 20th day of August, 2003, I caused a true and correct copy of the foregoing Brief in Support of **Defendants' Motion For Leave To File A Reply Brief To Plaintiffs' Response To The Joint Motion In Limine Of All Defendants To Preclude The Admission Of Evidence Regarding The Tredinnick Report And Documents Related Thereto** to be served upon counsel for Plaintiffs by First Class Mail, Postage Prepaid, addressed as follows:

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539 Center Street  
P.O. Box 190  
Bethlehem, PA 18016-0190

Jordan Yeager, Esquire  
Boockvar & Yeager  
714 Main Street  
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328 West Broad Street  
Quakertown, PA 18951

*Attorneys for Plaintiffs,  
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L. Kristen Blanchard